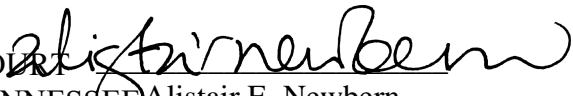


UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

  
Alistair E. Newbern  
U.S. Magistrate Judge

MARK WATSON,

Plaintiff,

v.

DAVID R. GRIMMETT,

Defendant.

Case No. 3:22-cv-00601

Chief Judge Waverly D. Crenshaw, Jr.  
Magistrate Judge Alistair E. Newbern

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**JOINT MOTION TO EXTEND FACT DISCOVERY  
AND DISCOVERY MOTIONS DEADLINES**

Plaintiff Mark Watson, and Defendant David R. Grimmatt, by and through their respective undersigned counsel, submit this Joint Motion to Extend Fact Discovery and Discovery Motions Deadlines (“Motion”) and state as follows:

1. On January 20, 2023, the Court entered its Initial Case Management Order, outlining various deadlines for the Parties. *See* ECF No. 20.
2. The Court set the deadline for fact discovery for July 17, 2023, and the deadline for all motions related to fact discovery to be filed by August 16, 2023. *Id.*
3. The deadline for dispositive motions is October 13, 2023. *Id.*
4. On May 31, 2023, the Parties filed a Joint Status Report informing the Court of their settlement negotiation progress. ECF No. 23.
5. While the Parties have not yet resolved this case amongst themselves yet, they are continuing to explore a resolution.

6. The Parties had begun exchanging discovery requests, and participating in formal discovery, but agreed amongst themselves to hold off on completing this formal discovery while pursuing a resolution.

7. The Parties are optimistic that they still may be able to resolve this case without the need for additional discovery and incurring additional expenses related to litigation. In fact, Defendant made a counteroffer to Plaintiff at the end of last week that Plaintiff is currently evaluating.

8. For these reasons, the Parties respectfully request the Court extend the fact discovery deadline to August 29, 2023, and the motions related to fact discovery deadline to September 13, 2023.

9. The requested extended deadlines should not conflict with the remaining scheduled dates and should leave plenty of time for the Parties to finish discovery and prepare dispositive motions, assuming that the Parties are unable to settle amongst themselves.

10. Counsel for both Parties have conferred regarding this Motion. The Parties agree on the relief requested and submit this Motion jointly.

11. This Motion is brought for good cause and not for the purpose of unnecessary delay.

**WHEREFORE**, for the reasons stated above, the Parties respectfully request that the Court grant this Motion, and extend the fact discovery deadline to August 29, 2023, and the motions related to fact discovery deadline to September 13, 2023.

Respectfully submitted,

s/ Colby Qualls

Colby Qualls

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Attorney for Defendant

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 17th day of July, 2023, a copy of the foregoing **Motion** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

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/s/ Caroline Drinnon  
Caroline Drinnon